

REILLY POZNER LLP
1900 16th Street, Suite 1700
Denver, Colorado 80202
Telephone: (303) 893-6100
Facsimile: (303) 893-6110
Michael A. Rollin

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**DECLARATION OF KERI REED
IN SUPPORT OF DEBTORS' TWO HUNDRED NINTH
OMNIBUS OBJECTION TO PORTIONS OF CLAIM NOS. 29883 AND 29879**

Pursuant to 28 U.S.C. §1746, I, Keri Reed, declare:

1. I am over 18 years of age and have personal knowledge of all of the facts set forth in this declaration and if called upon to testify as a witness, I could testify to the truth of the matters set forth herein.

2. I submit this Declaration in support of *Debtors' Two Hundred Ninth Omnibus Objection to Portions of Claim Nos. 29883 and 29879* ("Objection") [ECF No. 20030].

3. I am an Assistant Vice President of LAMCO LLC. LAMCO LLC is a non-debtor subsidiary of Lehman Brothers Holdings, Inc. ("LBHI") that has been charged with managing LBHI's assets. I have held this position since September 2010.

4. As a part of my duties as Assistant Vice President, I have contacted representatives of Citibank, National Association and Citigroup Global Markets, Inc. (the

“Claimants”), and have requested data supporting Section “M” of proof of claim numbered 29883 and Section “D” of proof of claim numbered 29879 (the “Claims”) in order to permit the Debtors to evaluate the validity of such Claims. On more than one occasion, I requested the specific legal and factual bases of Claim 29883, Section M, and on one occasion, I requested the specific legal and factual bases of Claim 29879, Section D. Notwithstanding such requests, the Claimants have not articulated a sufficient legal or factual basis for asserting the Claims, nor have they provided any explanation as to the nature of the debts alleged therein.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: September 15, 2011.

/s/ Keri Reed

Keri Reed